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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

D.S., a minor by and through his guardian
ad litem Elsa Acosta, individually and as
successor-in-interest to William Salgado;
C.S., a minor by and through his guardian
ad litem Elsa Acosta, individually and as
successor-in-interest to William Salgado;
J.S., a minor by and through her guardian
ad litem Elsa Acosta, individually and as
successor-in-interest to William Salgado;
M.S., a minor by and through her
guardian *ad litem* Elsa Acosta,
individually and as successor-in-interest
to William Salgado,

Plaintiffs,

v.

CITY OF HUNTINGTON PARK; NICK
NICHOLS; RENE REZA; MATTHEW
RINCON; APRIL WHEELER; and
DOES 5 through 10, inclusive,

Defendants.

Case No.: 2:23-cv-09412-CBM-AGR

District Judge Consuelo B. Marshall
Magistrate Judge Alicia G. Rosenberg

**STIPULATION FOR
CONSOLIDATION OF CASES**

1 **TO THIS HONORABLE COURT:**

2 **IT IS HEREBY STIPULATED** by and between the parties hereto that the
3 following lawsuits be consolidated for all purposes.

4 1. The case of *D.S., et al. v. City of Huntington Park, et al.*, No. 2:23-cv-
5 09412-CBM-AGR, was filed on November 8, 2023. The case is currently
6 in discovery.

7 2. The case of *William Castillo-Miranda, et al. v. City of Huntington Park, et*
8 *al.*, No. 2:24-cv-04898-CBM-AGR, was filed on June 11, 2024. A First
9 Amended Complaint was filed on July 29, 2024. A responsive pleading
10 thereto has not yet been filed.

11 Both cases should be consolidated and coordinated for purposes of trial. The
12 claims in both cases arise out of the death of William Salgado, who died as a result
13 of an incident involving officers of the City of Huntington Park Police Department
14 on October 30, 2022, in Huntington Park, California, in the County of Los Angeles.
15 These cases arise out of the same events and will involve the same core of operative
16 facts. The cases differ only in that they involve different plaintiffs, based on these
17 individuals' differing relationships with/to the decedent William Salgado, and in
18 that the plaintiffs in the *Castillo-Miranda* matter have asserted claims against two
19 additional officers not named as defendants in the *D.S.* matter. Accordingly, the
20 Parties believe good cause exists to consolidate the cases.

21 **IT IS FURTHER STIPULATED** that the Defendants in the *Castillo-*
22 *Miranda* matter shall, upon entry of any order granting or denying the Parties'
23 request for consolidation of the two related matters, have fourteen (14) days in
24 which to file a responsive pleading to the *Castillo-Miranda* Plaintiffs' First
25 Amended Complaint.

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1 IT IS SO STIPULATED.

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3 DATED: August 30, 2024

LAW OFFICES OF DALE K. GALIPO

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5 By: /s/ Dale K. Galipo

Dale K. Galipo¹
Benjamin S. Levine
Attorneys for Plaintiffs
D.S., C.S., J.S., and M.S.

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9 DATED: August 30, 2024

CARRAZCO LAW, A.P.C.

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11 By: /s/ Kent M. Henderson

Angel Carrazco, Jr.
Kent M. Henderson
Christopher L. Holm
Attorneys for Plaintiffs
William Omar Castillo Miranda, Juana
Maria Miranda, Omar Antonio Castillo
Blandon, Eugenia Guadalupe Espinoza
Salmeron, and Karla Vanessa Blandon

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18 DATED: August 29, 2024

**ALVAREZ-GLASMAN & COLVIN
ARNOLD M. ALVAREZ-GLASMAN
CITY ATTORNEY**

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20 By: 

Roger A. Colvin
Christy M. Garcia
Attorneys for Defendants

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25 _____
26 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other
27 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
28 content and have authorized the filing.